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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Joint Petition to Ensure) RM 9343
Interoperability of E911)
Emergency Calling Systems)

Comments

The Ad Hoc Telecommunications Users Committee (Ad Hoc), by its attorneys, hereby submits its comments on the above-captioned petition. The Joint Petitioners urge the Commission to initiate an investigation to determine the extent to which E911 interoperability issues could affect the delivery of emergency services.¹

The precise scope and meaning of the expression "E911 interoperability issues," is not specified in the subject petition. Indeed, Joint Petitioners state that their hope is that the Commission will initiate the requested investigation to document the extent to which E911 interoperability issues exist. What is clear is that Joint Petitioners are concerned that a number of telecommunications related factors could affect the efficacy of E911 as a means of delivering emergency services. The factors that Joint Petitioners identify as possibly affecting E911 service include: (a) whether the telecommunications service is provided by an Incumbent Local Exchange Carrier, a Competitive Local Exchange Carrier or a

¹ Joint Original Petition of The Joint Petitioners filed Aug. 4, 1998 ("Joint Petition"). The Joint Petitioners are: the Texas Advisory Commission on State Emergency Communications, the Greater Harris County 911 Emergency Network, Tarrant County 911, Denton County 911, Bexar County 911 and the National Association of State Nine-One-One Administrators.

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Wireless Carrier, (b) the type of switch or switches used, (c) the boundaries of local calling areas and dialing plan requirements, (d) local number portability, (e) the type of E911 CPE utilized and (f) the type of network technology and protocols used to provide E911 capabilities.² Not expressly stated but apparently also relevant are local budgetary constraints.³

Ad Hoc's members are major employers who have great interest in the delivery of emergency services to their employees, and to the public generally. Accordingly, Ad Hoc participated in that phase of CC Docket No. 94-102 in which the Commission, *inter alia*, proposed rules that would require PBXs, key telephone systems and other multi-line telephone systems to have the capability to transmit the calling station number (ANI) and caller location information (ALI) that would allow emergency response personnel to locate emergency conditions within large work places. Ad Hoc explained that the proposed rules, although well-intentioned, would be impractical and in many instances would delay the arrival of emergency response personnel. Ad Hoc pointed out that in many instances employers have implemented emergency response measures that are more effective than the one size fits all approach that was embodied in the proposed rules.

The Commission's staff urged Ad Hoc, equipment manufacturers and entities representing public safety authorities to discuss their concerns for purposes of determining whether a mutually satisfactory position could be

² Joint Petition at 2.

³ *Id.*

reached. After months of discussions, on April 1, 1997, Ad Hoc, the MultiMedia Telecommunications Association, the Associated Public-Safety Communications Officials-International, Inc. and the National Emergency Number Association submitted a consensus agreement regarding the E911/Multiline Telephone System (MLTS) issues raised in CC Docket No. 94-102. The Commission, however, has not yet acted on the consensus agreement. Joint Petitioners urge the Commission to act on the issues raised in CC Docket No. 94-102 and addressed in the consensus agreement.⁴ Ad Hoc agrees the E911/MLTS issues, "[s]hould be resolved promptly on the current record in [CC Docket No. 94-102], which includes a consensus settlement proposal from public safety and manufacturer/large user interests."⁵

The Joint Petition is not cause to reopen those issues. Indeed, Ad Hoc believes that it is not the Joint Petitioners' intention to do so. Ad Hoc addresses this matter because of the Joint Petition includes 911 CPE [customer premises equipment] in its interoperability concerns.⁶ The Joint Petition, however, does not define 911 CPE. Ad Hoc suspects that 911 CPE is a label that refers to less than all CPE, perhaps including only CPE used by public safety authorities in connection with E911 service, and does not include MLTS. Footnote 2 of the Joint Petition would make no sense if MLTS were included in the category of CPE covered by the 911 CPE label.

⁴ *Id.* at n.2.

⁵ *Id.*

⁶ See, Joint Petition at 2, 4 – 9.

As for the other concerns raised in the Joint Petition, Ad Hoc will review the comments of other parties and if warranted and helpful to the Commission submit reply comments.

Respectfully submitted,

Ad Hoc Telecommunications Users
Committee

By: 

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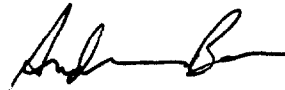
200.06/PLDG Comm 911 Interoperability

Certificate of Service

I, Andrew Baer, hereby certify that true and correct copies of the preceding Comments of the Ad Hoc Telecommunications Users Committee in RM No. 9343 were served this 18th day of September, 1998 via hand delivery upon the following parties:

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